

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

VENTURIST, INC.,)	
)	
Plaintiff)	
)	Case No. 2:06cv00494 SRW
v.)	
)	
)	
PAT MAUNEY,)	
)	
Defendant.)	
_____)	

**DEFENDANT'S MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION**

COMES NOW Defendant Pat Mauney (hereinafter "Defendant" or "Mauney"), pursuant to FED. R. CIV. P. 12(b)(2), and, through counsel, hereby moves this Court to dismiss Plaintiff's Complaint for lack of personal jurisdiction. Defendant, a citizen of the state of California, lacks sufficient, meaningful contacts with Alabama to render appropriate personal jurisdiction in this case and, as a result, Plaintiff's Complaint should be dismissed in its entirety by this Court.

WHEREFORE, for the reasons set forth herein and in a Memorandum Of Law In Support Of Defendant's Motion to Dismiss For Lack of Personal Jurisdiction and accompanying exhibits filed contemporaneously herewith, Defendant is entitled to dismissal of Plaintiff's Complaint in its entirety.

Respectfully submitted this 6th day of June, 2006.

/s/ Julie E. Jordan
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--and--

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ATTORNEYS FOR DEFENDANT

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document entitled
DEFENDANT'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION
has been served via the Court's ECF system to the following:

Emily C. Marks
BALL, BALL, MATTHEWS & NOVAK, P.A.
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P.O. Drawer 2148
Montgomery, AL 36102

This 6th day of June, 2006

/s/ Julie E. Jordan
Julie E. Jordan, Esq.